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**From:** Schneider, Matthew [Schneider.Matthew@epa.gov]  
**Sent:** 7/26/2018 2:34:43 PM  
**To:** Williams, Christopher [Williams.Christopher@epa.gov]; McClintock, Katie [McClintock.Katie@epa.gov]  
**CC:** Bustamante, Armando [Bustamante.Armando@epa.gov]; Muller, Lori [muller.lori@epa.gov]  
**Subject:** RE: Hwy 30 & Little Willow Programs - Additional information requested

Here is the proposed email I will send to them. Please review and let me know if you think its good to go. Katie, thanks for responding while out of the office!

Hi Michael,

Thank you for reaching out. I appreciate the proposal to send the information as it is compiled. We will grant an extension to our information request, however, can we please compromise and have the completed response by August 13?

I will be out on paternity leave for the month of September and we will need to complete our analysis and inspection report prior to August 24. If we are unable to meet that deadline, then unfortunately, this will have to be passed on to others in the agency who will likely take this in a more formal direction. We greatly appreciate how cooperative and responsive Alta Mesa (and Wade especially) has been and we would prefer to maintain this method of communication.

We have one additional follow up item to add to our list of previously requested information:

A. Provide the following leak detection and repair (LDAR) records for Little Willow and NWGP:

- i. All LDAR records that were generated for the time period beginning January 1, 2017, through present, including:
  - a. Equipment type or component name where leak was detected;
  - b. Method and equipment used to detect leak (e.g. Method 21 with OGI, or TVA) include recorded concentration, or video filename where applicable.
  - c. Date/time and leak was detected
  - d. Date/time leak was repaired,
  - e. Records of any corrective action taken including a description of the corrective action, and documentation of work completed (e.g. work orders)
  - f. Filename or names of the recorded videos that demonstrate that the identified leak was repaired, where applicable.

As the responses are generated, I would like to ask that you also include the following EPA staff on your responses, in case I unexpectedly have to take leave early than planned.

Christopher Williams : [williams.christopher@epa.gov](mailto:williams.christopher@epa.gov)

Katie McClintock: [mcclintock.katie@epa.gov](mailto:mcclintock.katie@epa.gov)

Please let me know ASAP if you are amenable to this compromise. Thank you,  
-Matt

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**From:** Williams, Christopher  
**Sent:** Thursday, July 26, 2018 8:25 AM  
**To:** McClintock, Katie <McClintock.Katie@epa.gov>; Schneider, Matthew <Schneider.Matthew@epa.gov>  
**Cc:** Bustamante, Armando <Bustamante.Armando@epa.gov>; Connell, Rebecca <Connell.Rebecca@epa.gov>; Muller,

Lori <muller.lori@epa.gov>

**Subject:** RE: Hwy 30 & Little Willow Programs - Additional information requested

# Ex. 5 DP & Ex. 7(E)

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**From:** McClintock, Katie

**Sent:** Thursday, July 26, 2018 9:52 AM

**To:** Schneider, Matthew <[Schneider.Matthew@epa.gov](mailto:Schneider.Matthew@epa.gov)>

**Cc:** Williams, Christopher <[Williams.Christopher@epa.gov](mailto:Williams.Christopher@epa.gov)>; Bustamante, Armando <[Bustamante.Armando@epa.gov](mailto:Bustamante.Armando@epa.gov)>;

Connell, Rebecca <[Connell.Rebecca@epa.gov](mailto:Connell.Rebecca@epa.gov)>; Muller, Lori <[muller.lori@epa.gov](mailto:muller.lori@epa.gov)>

**Subject:** Re: Hwy 30 & Little Willow Programs - Additional information requested

All sounds great to me except can we add the request for a few previous monthly leak checks at willow and maybe nw and I feel like there might have been one other follow up?

Sent from my iPhone

On Jul 26, 2018, at 6:19 AM, Schneider, Matthew <[Schneider.Matthew@epa.gov](mailto:Schneider.Matthew@epa.gov)> wrote:

Thanks Katie and Chris,

# Ex. 5 DP & Ex. 7(E)

## Ex. 5 DP & Ex. 7(E)

Thanks!

-Matt

**From:** Williams, Christopher

**Sent:** Thursday, July 26, 2018 7:12 AM

**To:** McClintock, Katie <[McClintock.Katie@epa.gov](mailto:McClintock.Katie@epa.gov)>

**Cc:** Schneider, Matthew <[Schneider.Matthew@epa.gov](mailto:Schneider.Matthew@epa.gov)>; Bustamante, Armando <[Bustamante.Armando@epa.gov](mailto:Bustamante.Armando@epa.gov)>; Connell, Rebecca <[Connell.Rebecca@epa.gov](mailto:Connell.Rebecca@epa.gov)>; Muller, Lori <[muller.lori@epa.gov](mailto:muller.lori@epa.gov)>

**Subject:** Re: Hwy 30 & Little Willow Programs - Additional information requested

Katie, Matt, and All:

## Ex. 5 Deliberative Process (DP) . Ex. 7(E)

Thanks,

Chris

On Jul 25, 2018, at 7:57 PM, McClintock, Katie <[McClintock.Katie@epa.gov](mailto:McClintock.Katie@epa.gov)> wrote:

## Ex. 5 Deliberative Process (DP) & Ex. 7(E)

## **Ex. 5 Deliberative Process (DP) & Ex. 7(E)**

Thoughts?

Sent from my iPhone

On Jul 25, 2018, at 2:06 PM, Schneider, Matthew <[Schneider.Matthew@epa.gov](mailto:Schneider.Matthew@epa.gov)> wrote:

Chris and Katie, I just received this request from Alta Mesa to extend their response date to August 20. As we discussed today about the expected report date, if we except this request, I will not be able to complete the report by the draft date proposed in the project agreement. As you know, I will also be out of the office for approximately 5 weeks beginning at/near that time, so I'm not sure how long the report will be delayed.

## **Ex. 5 DP & Ex. 7(E)**

Please let me know what you would like us to do. Thank you,

-Matt

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**From:** Michael Christian [<mailto:mchristian@mch-lawyer.com>]  
**Sent:** Wednesday, July 25, 2018 1:46 PM  
**To:** Wade Moore <[WMoore@high-mesa.com](mailto:WMoore@high-mesa.com)>; Schneider, Matthew <[Schneider.Matthew@epa.gov](mailto:Schneider.Matthew@epa.gov)>  
**Cc:** Jeff Janik <[JJanik@high-mesa.com](mailto:JJanik@high-mesa.com)>; Matt Frondorf <[matt.frondorf@bexarenergy.com](mailto:matt.frondorf@bexarenergy.com)>; Bustamante, Armando <[Bustamante.Armando@epa.gov](mailto:Bustamante.Armando@epa.gov)>; Robert Williams (TEAM) <[Robert.Williams@TeamInc.com](mailto:Robert.Williams@TeamInc.com)>; Billy Wolcott <[bwolcott@wolcottenvironmental.com](mailto:bwolcott@wolcottenvironmental.com)>  
**Subject:** RE: Hwy 30 & Little Willow Programs - Additional information requested

Mr. Schneider –

I am an attorney in Boise, and I represent High Mesa Holdings and Northwest Gas Processing. They have asked me to contact you and request an extension of time to respond to your request for information. HM and NWGP are marshaling internal and external personnel to provide a complete response, but input from multiple individuals is necessary. They anticipate that a complete response can be made by August 20. I suggest that an extension of time to respond is reasonable as good faith work on issues identified in the inspection has been ongoing, Wade Moore has been keeping you informed as that work progresses and I understand he has undertaken to supply with the information he has immediately available, and the narrative information you have requested is likely to be extensive.

I understand that Wade's attention to date has mostly been devoted to the on-site work items. However, HM and NWGP will endeavor to send responses to your individual requests as they are completed, as Wade has been doing with respect to the work items.

Thanks for your consideration of this request.

**Michael Christian**  
**MARCUS, CHRISTIAN, HARDEE & DAVIES, LLP**  
737 N. 7th Street  
Boise, ID 83702  
(208) 342-3563  
[mchristian@mch-lawyer.com](mailto:mchristian@mch-lawyer.com)

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**From:** Wade Moore <WMoore@high-mesa.com>  
**Sent:** Thursday, July 19, 2018 1:12 PM  
**To:** Schneider, Matthew <Schneider.Matthew@epa.gov>  
**Cc:** Jeff Janik <JJanik@high-mesa.com>; Michael Christian <mchristian@mch-lawyer.com>; Matt Frondorf <matt.frondorf@bexarenergy.com>; Bustamante, Armando <Bustamante.Armando@epa.gov>; Robert Williams (TEAM) <Robert.Williams@TeamInc.com>; Billy Wolcott <bwolcott@wolcottenvironmental.com>  
**Subject:** RE: Hwy 30 & Little Willow Programs - Additional information requested

Matt,  
Thanks for sending out videos, will see the below request goes, but lot to put together.  
Thanks,

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**From:** Schneider, Matthew [mailto:Schneider.Matthew@epa.gov]  
**Sent:** Thursday, July 19, 2018 12:54 PM  
**To:** Wade Moore  
**Cc:** Jeff Janik; Michael Christian; Matt Frondorf; Bustamante, Armando  
**Subject:** Hwy 30 & Little Willow Programs - Additional information requested

Hi Wade,

I am sending you a flash drive via UPS today containing the videos we collected last week. The tracking number is 1ZA4201T0193617898.

I understand that it may take some time to provide some of the documents I am requesting. I would like a complete response by July 27. If more time is needed to compile certain documents, please provide me with everything you have compiled by July 27 and propose a date for fulfilling the remaining requests.

**For Both Little Willow Road Gathering Station and NWGP HWY 30 Treating Facility:**

Provide the dates of construction, reconstruction, or modification for all affected facilities (e.g. storage vessel affected facilities, well-affected facilities, compressor affected facilities, pneumatic controller affected facilities, etc.), and any physical or operational changes which may have increased the emission rate of any relevant pollutant.

For each affected facility or regulated process unit, storage vessel, compressor, pneumatic controller, well site, etc. provide which federal regulations apply (for example NSPS OOOO, OOOOa, VV, VVa, etc), or if none apply, and a narrative explanation for how this determination was made.

Provide the initial annual report and the most recent annual report as described in 40 cfr 60.5420(b)/60.5420a(b)

For each reciprocating compressor, provide the total number of hours of operation since the last compressor rod packing replacement. Provide a record of the most recent rod packing replacement

For each pneumatic controller, provide the records required in 40cfr part 60.5420(c)/60.5420a(c)

**For the Little Willow Road Gathering Station:**

Provide a written description of the site operations, for example, how many water and oil tanks are on site, describe the on-site well that is non-producing, how many separators, dehydrators, compressors, etc. and what pieces of equipment are vented to what control devices (combustor, vapor recovery unit, compressors, etc.)

If applicable (i.e. the site has facilities subject to NSPS OOOOa), as described in 40cfr 60.5397a(b), provide the final fugitive emissions monitoring plan.

Provide the most recent annual report described in 40cfr 60.5397a(j), which includes the information described in 60.5420a(b)(7)

Provide the certified assessment for the storage vessel closed vent system as described in 40 cfr 60.5411a(d)

Provide records of Method 22 observations of the combustor for the past 3 months

**For the NWGP HWY 30 Treating Facility:**

Provide a written description of the site operations, for example, how many water/oil/condensate/NGL tanks are on site, describe the on-site treatment and separation processes, how many separators, dehydrators, compressors, etc. and what pieces of equipment are vented to what control devices (flares, etc.)

Please describe the operation of the flare(s) located on site. For example, is it air-assisted or non-assisted? For the time period while EPA was onsite, (10:00am July 11, 2018 through 12:30pm July 11, 2018) please provide net heating value of the gas being sent to the flare, the hydrogen content, and exit velocity of the gas stream, as described in 40 CFR part 60.18.

Thank you,

Matthew Schneider  
Chemical Engineer, Field Branch  
US EPA NEIC  
303-462-9292

